

operation indicated by the generate\_event command. The Migdal reference is allegedly cited for teaching what Van Hook fails to disclose.

---

Migdal also is not directed to an apparatus for graphics rendering in a mobile device and instead is directed to a network based computer system and as such, does not have resource constraints nor does it require the claimed structure. Applicants respectfully submit that Migdal fails to disclose the subject matter that is missing from Van Hook. In addition, Applicants also respectfully submit that one would not combine the teachings of the two references as it would not result in Applicants' claimed invention.

For example, the office action alleges that Migdal teaches the claimed wait\_until command and queuing of the rendering commands in response to such a command until the completion of the operation indicated by the generate\_event command (citing column 11, lines 35-37, 37-48). However, the WaitSyncID(g, j) command is not equivalent to the claimed wait\_until command. Migdal is directed to a multichip synchronization scheme wherein the WaitSyncID command "causes the R chips to block until all R chips have reached sync point i in g's command string. This command is broadcast to all R chips." (Column 10, lines 12-14). As such, the WaitSyncID command in Migdal stalls multiple chips until all chips have reached the sync point identified in the command. As such, Migdal is directed to load balancing across multiple chips using a WaitSyncID command to sync across the multiple chips. Proper synchronization described in Migdal is the synchronization across multiple chips, not the synchronization between rendering commands in the same command queue. Moreover, Applicants' claimed wait command causes the command queue to queue the rendering commands until completion of the generate\_event command. Applicants are unable to find such an operation as the WaitSyncID command does not appear to cause the rendering commands in the command queue that contains the WaitSyncID command, but again as noted above, the Migdal WaitSyncID command is used to sync up

operations across multiple chips. As such, Applicants respectfully submit that the claims are in condition for allowance.

In addition, even if one were to arguably combine the teachings of Migdal with Van Hook, it is respectfully submitted that such a result would radically modify Van Hook as Van Hook is not directed to a multichip control scheme. In fact, there would be no need for the WaitSyncID command in the Van Hook system as there are not multiple chips that are being synchronized. Accordingly, there is no motivation to combine the teachings of these references.

The dependent claims add additional novel and non-obvious subject matter.

Claim 10, 11, 13, 15, 16 and 17 are alleged to be similar in scope to claims 1-4 and 6-9 and as such, Applicants' remarks with respect to these claims are incorporated by reference and as such, these claims are also in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter.

In addition, as to claim 16, for example, this claim deals with a graphics rendering chip whereas the commands described in Migdal deal with sync commands across multiple chips and as such, the combination of Van Hook and Migdal also do not render the subject matter of this claim obvious as well.

Claims 5, 14 and 18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Van Hook and Migdal and Shimizu et al. Applicants respectfully reassert the relevant remarks made above with respect to Van Hook and Migdal and as such, these claims are also in condition for allowance.

Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Van Hook and Migdal and Sawano et al. Applicants respectfully submit that this claim is also allowable for the reasons noted above with respect to Van Hook and Migdal.

Claims 24 and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Van Hook and U.S. Patent Application Publication No. 2004/0223614 (Seaman). The Seaman reference is directed to a secure video receiver that provides video on demand to a user's TV set. In contrast, Applicants claim a mobile device with a baseband receiver CPU and graphics rendering chip. Since neither of the references deal with mobile devices, Applicants respectfully submit that the claims are in condition for allowance. In any event, even taking the teachings of the references, the claim is still not rendered obvious. For example, the office action alleges that Van Hook teaches, among other things, an external memory device coupled to a graphics rendering chip across an external memory interface. Applicants claim, among other things, a mobile device that includes a graphics rendering chip that includes an embedded memory device, a direct memory access device and an external memory interface and that the external memory device stores at least one of a plurality of rendering data sets that may be provided to the embedded memory for processing. The cited portion, namely column 48, lines 27-30 do not appear to describe any graphics rendering chip with embedded memory as alleged. Accordingly, the claims are believed to be in condition for allowance. If the rejection is maintained, Applicants respectfully request a showing as to the claimed structure.

In addition, Van Hook is cited as teaching the claimed mobile device except for a baseband receiver coupled to a wireless antennae. However, as noted above, Van Hook does not appear to teach a mobile device nor does the Seaman reference. As such, the claims are also in condition for allowance for this reason.

Claim 26 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Van Hook and Seaman and further in view of Shimizu et al. Applicants respectfully reassert the relevant remarks made above with respect to claim 24 and as such, this claim is also believed to be in condition for allowance.

Claims 27 and 28 are also believed to be in condition for allowance as at least depending from an allowable base claim. In addition, as to claim 27, Applicants respectfully reassert the relevant remarks made above with respect to claims 1-4 and 6-9.

Applicants respectfully request that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

Date: 7/22/05

By: C. Reckamp  
Christopher J. Reckamp  
Registration No. 34,414

Vedder, Price, Kaufman & Kammholz, P.C.  
222 N. LaSalle Street  
Chicago, Illinois 60601  
PHONE: (312) 609-7599  
FAX: (312) 609-5005